

THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

TEAM SYSTEMS INTERNATIONAL, LLC,

Debtor.

Chapter 7

Case No. 22-10066 (CTG)

Re: Docket No. 181

**CERTIFICATE OF COUNSEL REGARDING THE APPLICATION OF THE
CHAPTER 7 TRUSTEE FOR AN ORDER AUTHORIZING RETENTION OF
VENABLE LLP AS SPECIAL COUNSEL TO THE CHAPTER 7 TRUSTEE
EFFECTIVE AS OF MAY 17, 2022**

The undersigned hereby certifies as follows:

1. On June 7, 2022, the Interim Chapter 7 Trustee filed the *Application of the Chapter 7 Trustee for an Order Authorizing Retention of Venable LLP as Special Counsel to the Chapter 7 Trustee Effective as of May 17, 2022* (the “Application”)¹ [D.I. 181] with this Court.

2. The deadline to file an objection or other response to the relief requested in the Motion was June 21, 2022 at 4:00 p.m. Three objections to the Application were filed [D.I. 201, 202 and 206]. Prior to hearing on the Application, the undersigned circulated a revised form of proposed order in attempt to address certain of the objections raised (the “Revised Proposed Order”). A copy of the Revised Proposed Order is attached hereto as **Exhibit A**. Attached hereto as **Exhibit B** is a redline version of the Revised Proposed Order indicating the changes made from the original form of order filed with the Application.

3. On June 30, 2022, the Court held a hearing on the Application (the “Hearing”). At the Hearing, the Court overruled the objections that were not resolved by the Revised Proposed Order and indicated the Court’s willingness to enter an order approving the retention of

¹ Capitalized terms used but not defined herein have the meanings assigned to such terms in the Application.

Venable on either a contingency basis or an hourly basis, at the discretion of the Interim Chapter 7 Trustee.

4. The Interim Chapter 7 Trustee has determined to proceed with the retention of Venable on a contingency basis as outlined in the Application and as set forth in the Revised Proposed Order.

5. Accordingly, the Interim Chapter 7 Trustee respectfully requests that the Court enter the Revised Proposed Order at its earliest convenience.

Dated: July 1, 2022

By: /s/ David W. Carickhoff
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